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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**  
9  
10 **AT SEATTLE**

11 **JOANNE ANGEL,** ) Case No.  
12 )  
13 Plaintiff, ) **COMPLAINT FOR VIOLATION**  
14 ) **OF FEDERAL FAIR DEBT**  
15 ) **COLLECTION PRACTICES ACT**  
16 )  
17 vs. )  
18 **WELTMAN, WEINBERG & REIS)**  
19 **CO., LPA,** )  
20 )  
21 Defendant. )  
22

23 **NATURE OF ACTION**

24 1. This is an action brought under the Fair Debt Collection Practices  
25 Act ("FDCPA"), 15 U.S.C. § 1692 *et seq.*  
26

27 **JURISDICTION AND VENUE**

28 2. This Court has jurisdiction under 15 U.S.C. § 1692k(d) and 28  
U.S.C. § 1331.

3. Venue is proper before this Court pursuant to 28 U.S.C. §1391(b),  
COMPLAINT FOR VIOLATIONS OF THE FAIR  
DEBT COLLECTION PRACTICES ACT-1

WEISBERG & MEYERS, LLC  
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1 where the acts and transactions giving rise to Plaintiff's action occurred in this  
2 district, (where Plaintiff resides in this district), and/or where Defendant transacts  
3 business in this district.  
4

## 5 **PARTIES**

6  
7 4. Plaintiff, Joanne Angel ("Plaintiff"), is a natural person who at all  
8 relevant times resided in the State of Washington, County of King, and City of  
9 Bellevue.  
10

11 5. Plaintiff is a "consumer" as defined by 15 U.S.C. § 1692a(3).

12 6. Defendant, Weltman, Weinberg & Reis Co., LPA ("Defendant") is  
13 an entity who at all relevant times was engaged, by use of the mails and  
14 telephone, in the business of attempting to collect a "debt" from Plaintiff, as  
15 defined by 15 U.S.C. §1692a(5).  
16  
17

18 7. Defendant is a "debt collector" as defined by 15 U.S.C. § 1692a(6).  
19

## 20 **FACTUAL ALLEGATIONS**

21 8. Plaintiff is a natural person obligated, or allegedly obligated, to pay a  
22 debt owed or due, or asserted to be owed or due a creditor other than Defendant.  
23

24 9. Plaintiff's obligation, or alleged obligation, owed or due, or asserted  
25 to be owed or due a creditor other than Defendant, arises from a transaction in  
26 which the money, property, insurance, or services that are the subject of the  
27

1 transaction were incurred primarily for personal, family, or household purposes.  
2 Plaintiff incurred the obligation, or alleged obligation, owed or due, or asserted to  
3 be owed or due a creditor other than Defendant.  
4

5 10. Defendant uses instrumentalities of interstate commerce or the mails  
6 in a business the principal purpose of which is the collection of any debts, and/or  
7 regularly collects or attempts to collect, directly or indirectly, debts owed or due,  
8 or asserted to be owed or due another.  
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11 11. Defendant sent Plaintiff written correspondence on June 11, 2010  
12 demanding payment for an alleged debt that was placed upon attorney law firm  
13 letterhead.  
14

15 12. Said correspondence failed to notify Plaintiff that an attorney had yet  
16 to review the particular circumstances of Plaintiff's alleged debt when no such  
17 review had been undertaken at the time said correspondence was sent.  
18

19 13. Said correspondence was further designed to mislead Plaintiff that  
20 Defendant could pursue legal action against Plaintiff, when in fact Defendant was  
21 not licensed to practice law in the jurisdiction where Plaintiff resides, constituting  
22 a false representation and deceptive practice in connection with the collection of  
23 an alleged debt. (15 U.S.C. §§ 1692e(3), 1692e(10)).  
24  
25

26 14. Defendant's actions constitute conduct highly offensive to a  
27  
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1 reasonable person, and as a result of Defendant's behavior Plaintiff suffered and  
2 continues to suffer injury to Plaintiff's feelings, personal humiliation,  
3 embarrassment, mental anguish and/or emotional distress.  
4

5 **COUNT I**  
6

7 15. Plaintiff repeats and re-alleges each and every allegation contained  
8 above.  
9

10 16. Defendant violated the FDCPA as detailed above.

11 WHEREFORE, Plaintiff prays for relief and judgment, as follows:

- 12 a) Adjudging that Defendant violated the FDCPA;  
13  
14 b) Awarding Plaintiff statutory damages, pursuant to 15 U.S.C. §1692k,  
15 in the amount of \$1,000.00;  
16  
17 c) Awarding Plaintiff actual damages, pursuant to 15 U.S.C. §1692k;  
18  
19 d) Awarding Plaintiff reasonable attorneys' fees and costs incurred in  
20 this action;  
21  
22 e) Awarding Plaintiff any pre-judgment and post-judgment interest as  
23 may be allowed under the law;  
24  
25 f) Awarding such other and further relief as the Court may deem just  
26 and proper.  
27

**TRIAL BY JURY**

Plaintiff is entitled to and hereby demands a trial by jury.

Respectfully submitted this 24th day of August, 2010.

s/Jon N. Robbins

Jon N. Robbins

WEISBERG & MEYERS, LLC

Attorney for Plaintiff